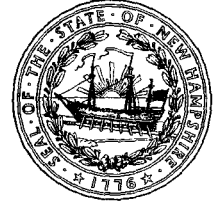




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

February 15, 2005

CERTIFIED MAIL
7000 1670 0001 2915 7448
RETURN RECEIPT REQUESTED

NOTICE OF PAST VIOLATION

Quick-Turn Flex Circuits, LLC
174 North Main St.
Franklin, NH 03235

Attn: Richard Kloza, Operations Manager

Re: Quick-Turn Flex Circuits, LLC
Franklin, New Hampshire
EPA ID # NHD986472249

Dear Mr. Kloza:

On January 21, 2005, the Department of Environmental Services, Waste Management Division ("DES") conducted an inspection of Quick-Turn Flex Circuits, LLC ("Quick-Turn"); located at 174 North Main St. in Franklin, NH. The purpose of the inspection was to determine Quick-Turn's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules, Env-Wm 100-1100.

As a result of the inspection, the following deficiencies in your hazardous waste management program were documented:

1. Env-Wm 502.01 – Hazardous Waste Determination

At the time of the inspection, no formal hazardous waste determination had been performed for the waste plating bath material that had leaked onto the floor of the wet chemistry area.

Env-Wm 502.01 requires that all generators of waste determine if their waste is a hazardous waste. Waste determined to be hazardous must be handled pursuant to the requirements of the Hazardous Waste Rules.

DES requested Quick-Turn to remove the waste material from the floor of the wet chemistry area and determine if that waste material was a hazardous waste.

In a February 3, 2005 email, Richard Kloza, Operations Manager, stated that the material was removed from the floor and treated as a hazardous waste in the on-site wastewater treatment unit. No further action is required.

2. Env-Wm 507.01(a)(3) – Storage Requirements

At the time of the inspection, one (1) container of hazardous waste F006 sludge stored in the wet chemistry area was not closed. See the attached Container Inventory (“Inventory”).

Env-Wm 507.01(a)(3) requires generators to ensure that containers storing hazardous waste be closed at all times, except when waste is being added to or removed from the containers.

DES requested Quick-Turn to ensure that containers storing hazardous waste be closed at all times, except when adding waste to or removing waste from, the containers.

In a January 27, 2005 email, Richard Kloza, stated that the container of hazardous waste F006 sludge has been closed. No further action is required.

3. Env-Wm 507.03(a)(1)b. & d. - Container Marking

At the time of the inspection, two (2) 55-gallon containers of hazardous waste sodium hydroxide were not marked with the words “Hazardous Waste” and the EPA or state waste number. See the attached Inventory.

Env-Wm 507.03(a)(1)b. & d. requires that all containers and tanks used for the storage of hazardous waste to be marked with the words “Hazardous Waste” and the EPA or state waste number.

DES requested that Quick-Turn properly mark all containers and tanks of hazardous waste at the time they are first used to store waste with the words “Hazardous Waste” and the EPA or state waste number.

In the January 27, 2005 email, Richard Kloza, stated that the containers of hazardous waste sodium hydroxide have been treated in the on-site wastewater treatment unit. No further action is required.

4. Env-Wm 508.02(d) – Small Quantity Generator Storage Requirements

At the time of the inspection, adequate aisle space was not provided for one (1) 55-gallon container of hazardous waste hydrochloric acid and one (1) 15-gallon container of hazardous waste fluoboric acid stored in the wet chemistry area. See the attached Inventory.

Env-Wm 508.02(d) requires generators to maintain a minimum of 2 feet of aisle space to allow for inspection of at least one side of each container.

DES requested Quick-Turn to ensure that the required aisle space is maintained for each container of hazardous waste stored at the facility.

In the January 27, 2005 email, Richard Kloza, stated that the containers of hazardous waste hydrochloric acid and fluoboric acid have been treated in the on-site wastewater treatment unit. No further action is required.

5. Env-Wm 1102.03(c) – Universal Waste Lamp Management

At the time of the inspection, three (3) containers of universal waste lamps were not closed. See the attached Inventory.

Env-Wm 1102.03(c)(1) requires universal waste containers to be closed, except when universal waste is being added to or removed from the container.

DES requested Quick-Turn to ensure that all containers of universal waste lamps are closed, except when universal waste is being added to or removed from the container.

In the January 27, 2005 email, Richard Kloza, stated that the three (3) containers of universal waste lamps have been closed. No further action is required.

DES believes the deficiencies identified during the inspection have been corrected and acknowledges receipt of documents that corroborate the corrective measures taken by Quick-Turn to achieve compliance. Accordingly, no further action in response to the listed deficiencies is required. However, DES personnel may re-inspect your facility at a later date to determine whether the facility is maintaining full compliance with the applicable rules. Fines may also be pursued for any or all violations observed during this or subsequent inspections of the facility.

Enclosed you will find a copy of the completed Hazardous Waste Generator Inspection Report which documents the compliance status of your facility at the time of the inspection. This report may also be of value to you for use in determining future compliance with the New Hampshire Hazardous Waste Rules.

The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at <http://www.des.state.nh.us/hwcs/>, or by contacting the Public Information Center at (603) 271-2975.

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the

meantime, if you have immediate questions about pollution prevention, please feel free to contact her at 271-6398.

As a service to New Hampshire's hazardous waste generators, the Division currently maintains a Hazardous Waste Assistance Hotline which is available for the public to contact our knowledgeable staff of hazardous waste inspectors. The hazardous waste staff members are available to answer questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program, including the administrative plans and documents required under the Hazardous Waste Rules. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets on specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policies, regulatory interpretation letters and networking with other state or federal agencies to answer any questions at a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM toll-free at (1-866) HAZ-WAST (in-state only) or at (603) 271-2942.

Should you have any questions regarding this letter, please contact the lead inspector, Robert Bishop, or Tod Leedberg of the Hazardous Waste Compliance Bureau at 271-2942. Thank you for your cooperation.

Sincerely,



John J. Duclos, Administrator
Hazardous Waste Compliance Bureau
Waste Management Division

cc: DB/RCRA/NOPV/Archives
Anthony P. Giunta, P.G., Director, WMD
Gretchen Hamel, Administrator, DES Legal Unit
Paul L. Heirtzler, P.E., Administrator, Waste Management Programs, WMD
Scott Clarenbach, Fire Chief, Franklin Fire Department, 59 West Bow St., Franklin, NH 03235

E-mail: JJD/SD

Enclosure: Hazardous Waste Generator Inspection Report